directed), to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. See In re Vaeck, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991); M.P.E.P. §2143.

First of all the Applicant reasserts the argument made in the previous paper, that the Burrows reference is inapplicable to the present claims. The claims of the present invention are directed to a compressed lexicon for use in speech recognition and synthesis. However, it should be noted that Burrows only discloses an indexing process for indexing web pages, and not a lexicon for speech applications. It is clear from the disclosure of the Burrows document that there is no lexicon used or created from the web pages and that an index of words in a web page is not a lexicon for a speech application. Further, the Burrows reference is totally inapplicable for use in a speech application. Thus, the Burrows reference and the present invention are completely unrelated, and patentably distinct from each other. Therefore, the applicant asserts that one of ordinary skill in the art of speech applications would not look or consider a web indexing procedure to be relevant to a speech application or for generating a lexicon, of any sort for a speech application.

Second the Examiner states that one of ordinary skill in speech application would look to the Sarukkai reference to account for the shortcomings of the Burrows reference. The Sarukkai reference is directed to a computer system for user provided speech actuation of access to stored information. A speech recognition processor operating on the computer system recognizes words based on the input speech utterances of the user in accordance with a set of language/acoustic model and speech recognition search parameters. Software running on the CPU scans a document accessed by a web browser to form a web triggered word set from a selected subset of information in the document. The language/acoustic model and speech recognition search parameters are modified dynamically using the web triggered word set, and used by the speech recognition processor for generating a word string for input to the browser to initiate a change in the information accessed. Sarukkai, describes the basics of speech recognition, and a method for dealing with out of context words. The Sarukkai reference relates to speech recognition and web applications, and has nothing whatsoever to do with generating a compressed lexicon for use in a

speech application. Therefore, the applicant asserts that the Sarukkai reference is also inapplicable to the present set of claims.

The Examiner has apparently determined that the present invention is directed towards speech recognition in internet portals. As the primary reference the Examiner has cited a reference directed to a "Method for Parsing, Indexing and Searching World Wide Web Pages". The Examiner has not provided any indication as to why one of ordinary skill in the speech application/recognition art would consider this reference relevant to generating a compressed lexicon for use in a speech application. Therefore, the applicant asserts that the Examiner has not made a *prima facie* case of obviousness. Thus, the applicant asserts that the obviousness rejection has been overcome.

Further, in the previous paper the Applicant provided a detailed analysis of the Burrows reference as it compared to the claims of the present application. The applicant pointed out a number of differences or deficiencies in the Burrows reference as applied to the present claims. The addition of the Sarukkai reference does not remedy any of these deficiencies. Therefore, the combination of the Burrows and Sarukkai references (if applicable) does not render the claims obvious. Thus for this reason as well the Applicant asserts that the obviousness rejection has also been overcome.

In item 4 of the Office Action the Examiner indicated that although the claims are interpreted in light of the specification, limitations are not read into to the claims. The Examiner is correct. However, the Applicant is also entitled to be their own lexicographer defining the meaning of a word or words. It is entirely proper to use the Specification to interpret what the Applicant meant by a word or phrase in the claim. See Dupont DeNemours and Co. vs. Phillips Petroleum Co., 849 F2d 1430, 7 U.S.P.Q. 2d 1229, 1131, *cert. denied* 488 U.S. 986 (1988). Therefore, the Applicant is respectfully requesting the Examiner give the claims the appropriate meanings as defined in the specification, and as argued in the previous paper.

In conclusion, it is believed that neither Burrows nor Sarukkai taken singly or in combination disclose, teach or suggest the elements of any of claims 1-31 as amended. Specifically, it is asserted that Burrows does not disclose a lexicon for speech applications as is commonly understood in the art, or word-dependent data as defined in the specification.

Therefore, it is asserted that claims 1-31 are allowable over Burrows. Reconsideration and allowance are respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

WESTMAN, CHAMPLIN & KELLY, P.A.

By: _____
Nathan M. Rau, Reg. No. 53,675
Suite 1400 - International Centre
900 Second Avenue South
Minneapolis, Minnesota 55402-3319
Phone: (612) 334-3222 Fax: (612) 334-3312

NMR/jmt